

Process

The draft EIS for the rail transit project has been made available on the web. It is also provided on a DVD disk. When we asked for a hard paper copy for the League of Women Voters to review, we were told it would cost us \$59. When we looked at a copy in the library we could understand why. There are many colored illustrations and foldout maps. But that is exactly the point! These can only be printed on a large office printer that can use 11" x 17" paper. The League doesn't have such a printer and most people don't. Not to mention the burden of the cost of color cartridges for ink jet printers!

This is so ridiculous! Many of our members and the general public are not computer literate – they need something they can hold in their hands and read. Even we who are used to using computers need to print out pages that need close attention.

We think that some of the money that went into producing this beautiful document could have been allocated to a less expensive book that was made widely available to people who want to read it. And considering all the money that has been spent in promoting the rail project, even printing a lot of copies of the expensive version would have not been that outrageous.

If you want the public to participate, you have to make it easy. Otherwise, it is just a shibai. We think the City should stop the whole process and start over again, making a printed copy of the DEIS available to everyone who wants one. It should certainly make printed copies of the Supplement to the DEIS that we request available to anyone who wants one.

Chapter 01: Background, Purpose and Need

The Department of Business, Economic Development and Tourism (DBEDT) 2030 population projection series was used in the DEIS. However, DBEDT issued its 2035 population projection series in January 2008 which is lower than the 2030 series figures for Oahu. The lower figures would have an impact on transit ridership and employment.

The U.S Census Bureau's annual estimates of the population for Oahu from 2000 to 2007 were lower than the DBEDT 2030 population series for that period. Estimates are improvement over projections. The average annual growth rate of the census estimates between 2000 and 2007 was much lower than both the 2030 and 2035 DBEDT annual growth rates for this period. If this continues to 2030, then our population would be lower than 2030 and 2035 population series have projected.

Since early 2008, Honolulu has been in a recession, which has caused a decline in tourism and employment, thus reducing in-migration. The Supplemental DEIS must cover these points.

Chapter 2: Alternatives Considered

The Managed Lane alternative was given insufficient consideration. Cost assigned to this alternative was grossly inflated. Ridership projection was unrealistically low. The improvement to bus service resulting from this alternative was dismissed, resulting in too small a projected benefit.

Why does the train start in Kapolei? The stated reason of starting at the maintenance facility is inadequate. Every other new system was started in the city, where the riders are. Washington, DC, experienced unexpected revenue from midday riders going to lunch. How did other systems cope with the distance from maintenance?

The descriptions of the planned rail stations are inadequate:

How high will the Ala Moana station be?

Will there be restrooms in any of the stations?

In the illustrations, mezzanines (in the text) are called concourses. Or are these 2 different things?

Chapter 4

Environmental Justice Sections 4.6.5 Banana Patch Community and 4.6.6 Mitigation

The DEIS notes that this is a multi-generational community in the area bordering Waipahu and Pearl City. Residents who are primarily of Asian extraction and poor occupy it. It is also the place designated for the Pearl Highland park-and-ride lot that will serve the Pearl Highlands Station. All of the Build Alternatives would displace residences, including single-family homes, businesses and one church.

This section concludes, "Impacts to the Banana Patch community suggest a disproportionate effect on community cohesion and isolation in addition to the relocation effects. The displacement of residences could result in social interaction or sense of community, stability, and psychological unity by removing residents who have resided in the same community for generations. Due to the high cost of living and available land, it is unlikely that residents would be co-located in another area of the city." In other words, the residents so dislocated have no place to go. It will be hard enough to relocate the families individually who will most likely join the ever-increasing ranks of the homeless.

Under 4.6.6 Mitigation it is stated, "The identification of a disproportionately high and adverse effect on EJ populations does not preclude a project from moving forward if a mitigation measure that would avoid or reduce the disproportionately high and adverse effects are not practicable." The document further states that since the project would not result in disproportionately high and adverse impacts within the Oahu metropolitan planning EJ areas, no specific mitigation measures to reduce impacts are warranted. Again, in other words, tough luck. As long as you don't wipe out a really big hunk of low-income areas, you don't have to worry about destroying small areas, no matter how poor or desperate the residents may be.

If we remember correctly, the City's response to the protests against urban renewal in Chinatown with widespread displacement of poor people was, since there was no other affordable place to move them to, the displaced simply had to accept it. Fortunately People Against Chinatown Evacuation (PACE) was formed and wielded enough pressure that the project was abandoned.

It is bad enough that we have a throwaway society as far as material things are concerned. There is no way we can justify throwaway people. If you cannot mitigate bad effects, you don't proceed!

Elsewhere in the document re-alignments are suggested to save historic buildings. But no such measures are considered necessary when it is only poor people that are in the way of the train or a parking lot!

We believe the mitigation measures in this case are totally inadequate. Either the plan should be changed or the residents suitably relocated.

Visual and Aesthetic Conditions, 4.7

The rail transit system will be highly visible and generally unsightly. We note that each station will have one, two, or three platforms, each 300 feet long and a minimum of 12 feet wide. Center platforms will be a minimum of 30 feet wide. These are huge! The most deleterious impacts will be on existing buildings where the train comes close, blocking views, light, and air. The overall impact on the island of Oahu will be such that it is certain to have an adverse impact on tourism, our main economic industry. Who will want to visit a "tropical paradise" that is just as ugly, if not uglier, than the place you live?

The DEIS presents many simulated viewpoint figures that are useful in projecting the visual impacts of the project. However, the last figure in the series Figures 4-17 through 4-36 is of the station near Mother Waldron Park near Halekauwila and Cooke Streets. There is no figure for the station at Ala Moana Center. Please include one in the Supplemental Draft/Final EIS. There are also no descriptions of the planned future stations on the routes to the University of Hawaii and Waikiki. Including these in the Supplemental Draft/Final EIS would be helpful.

The DEIS notes that the Chinatown station will be 30 feet above street level and that other stations in the downtown area will block views from the fourth and fifth story windows. In the Supplemental Draft/Final EIS, please indicate the actual dimensions and the elevation above street level of each station in the text accompanying the figures.

Chapter 06: Cost and Financial Analysis

The declining economy is a major concern that affects this project. The Supplemental DEIS should address the following points:

If the revenue of the general excise and use tax surcharge declines, what steps will the city take to make up the shortfall? Already, citizens are decreasing their spending. How will this affect the capital costs?

If Queen Street replaces Halekauwila Street as part of the transit route, how will this impact transit cost?

Does Federal Transit Administration contingency allocation take into consideration a recession